

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

JOANNE M. ROYER,	)	
	)	
Plaintiff,	)	
v.	)	
	)	CIVIL ACTION NO:
BLUE CROSS BLUE SHIELD OF	)	NO: 05-CV-10448-GAO
MASSACHUSETTS, INC., BLUE CROSS	)	
BLUE SHIELD LONG-TERM	)	
DISABILITY BENEFIT PLAN, a/k/a	)	
OMNIBUS WELFARE BENEFITS	)	
PLAN, KEMPER NATIONAL	)	
SERVICES, INC., BROADSPIRE	)	
SERVICES, INC., AND SHELDON	)	
MYERSON, MD.,	)	
	)	
Defendants.	)	
	)	

**MOTION TO ADMIT ATTORNEY *PRO HAC VICE***

Pursuant to Local Rule 83.5.3 and the attached Affidavit and Certificate of Admission to the Bar of Illinois, the undersigned counsel moves the admission *pro hac vice* of Jeremy J. Glenn, of the law firm of Meckler, Bulger & Tilson, LLP, 123 North Wacker Drive, Suite 1800, Chicago, Illinois 60606. Mr. Glenn will be representing the following defendants: Blue Cross Blue Shield Long-Term Disability Benefit Plan, a/k/a Omnibus Welfare Benefits Plan, Kemper National Services, Inc., Broadspire Services, Inc. and Sheldon Myerson, M.D. in the above-entitled case.

Plaintiff's counsel Bernard A. Kansky has advised the undersigned that he has no opposition to this motion.

Respectfully submitted,

DATED: June 27, 2006

/s/ Edward S. Rooney, Jr.  
Edward S. Rooney, Jr.  
BBO No. 426840  
ECKERT SEAMANS CHERIN  
& MELLOTT, LLC  
One International Place, 18<sup>th</sup> Floor  
Boston, MA 02110  
(617) 342-6800

OF COUNSEL:

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312-474-7900

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**CERTIFICATE OF SERVICE**

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on 6/27/06

By: E. S. Rooney Jr.

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

JOANNE M. ROYER,

Plaintiff,

vs.

BLUE CROSS BLUE SHIELD OF  
MASSACHUSETTS, INC.; BLUE CROSS BLUE  
SHIELD LONG-TERM DISABILITY BENEFIT  
PLAN, a/k/a OMNIBUS WELFARE BENEFITS  
PLAN; KEMPER NATIONAL SERVICES, INC.;  
BROADSPIRE SERVICES, INC.; and  
SHELDON MYERSON, M.D.,

Defendants.


Civil Action No:  
05-CV-10448-GAO

**AFFIDAVIT**

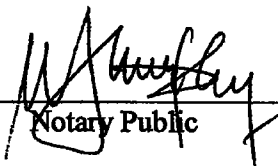
I, Jeremy J. Glenn, being first duly sworn, under oath state that I am fully familiar with the facts set forth herein, and would competently and truthfully testify to the same if called upon to do so at deposition or trial.

1. My name is Jeremy J. Glenn.
2. I am admitted to practice before the U.S. Court of Appeals for the Seventh and Third Circuits and the U.S. District Court for the Northern District of Illinois.
3. I am a member in good standing in every jurisdiction where I have been admitted to practice.
4. There are no disciplinary proceedings pending against me as a member of the bar in any jurisdiction.

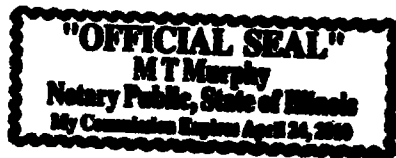
5. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

  
\_\_\_\_\_  
Jeremy J. Glenn

SUBSCRIBED AND SWORN to  
before me this 26<sup>th</sup> day of  
June 2006.

  
\_\_\_\_\_  
Notary Public

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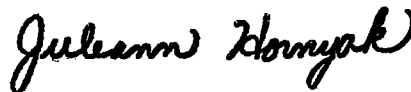
## **Certificate of Admission To the Bar of Illinois**

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Jeremy J. Glenn

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 6, 1997 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto  
placed my hand and affixed the seal  
of said Supreme Court, at Springfield,  
in said State, this Monday, May 01, 2006.



Clerk